REMARKS

Applicant is in receipt of the Office Action mailed July 9, 2007. Claims 12-22 and 28 have been amended. Claims 1-33 remain pending in the application.

Objection to the Specification:

The specification was objected to due to an erroneous application number in an incorporation by reference. The specification has been amended to correct the error and also supply the appropriate U.S. Patent Number. Accordingly, removal of the objection is respectfully requested.

Objection to the Claims:

Claim 28 was objected to due to a typographical error. Claim 28 has been amended to correct the error. Accordingly, removal of the objection is respectfully requested.

Rejection Under 35 U.S.C. § 101:

Claims 12-22 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claims 12-22 have been amended to recite, in pertinent part, a "computer-readable storage medium." Support for the amendments to claims 12-22 may be found in Applicant's specification at least on page 63, lines 1-6. Applicant submits that claims 12-22 recite statutory subject matter and respectfully requests withdrawal of the § 101 rejection.

Rejections Under 35 U.S.C. § 103(a):

Claims 1, 4, 11, 12, 15, 22, 23, 26, and 33 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic (U.S. Patent No. 7,111,076), Helgeson et al.(U.S.

Patent No. 6,643652, hereinafter "Helgeson"), and Olson et al. (U.S. Patent No. 5,987,376, hereinafter "Olson"). Claims 2, 13, and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Law (WO 02/32171), Shaw et al. (U.S. Patent No. 6,362,836, hereinafter "Shaw"), and Chou et al. (U.S. Patent No. 6,247,056, hereinafter "Chou"). Claims 3, 14, and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Ozzie et al. (WO 01/06365, hereinafter "Ozzie"). Claims 5, 16, and 27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Aldred et al. (U.S. Patent No. 5,539,886, hereinafter "Aldred"). Claims 6, 7, 16, 18, 28, and 29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Harvey et al. (U.S. Patent No. 6,487,583, hereinafter "Harvey"). Claims 8, 19 and 30 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Traversat et al. (U.S. Patent No. 7,167,920, hereinafter "Traversat"). Claims 9, 20, and 31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Gupta et al. (U.S. Patent No. 7,051,102, hereinafter "Gupta"). Claims 10, 21, and 32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Abjanic, Helgeson, and Olson, and further in view of Bentali et al. (U.S. Patent No. 6,282,170, hereinafter "Bentali"). Applicant respectfully traverses the rejections in light of the following remarks.

To establish a *prima facie* case of obviousness of a claimed invention, all claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974), MPEP 2143.03. Applicant respectfully submits that the cited references, taken individually or in combination, do not teach or suggest all the limitations recited in the claims.

In particular, Applicant respectfully submits that the cited references, taken individually or in combination, do not teach or suggest a method comprising translating a message from an original format to a portable format on a first computer system, thereby generating a portable message, wherein the portable message comprises metadata which

comprise identifying characteristics of the source application, in combination with the remaining features of claim 1. The Office Action asserts that Abjanic teaches these features in Fig. 2. For at least the reasons discussed as follows, Applicant respectfully disagrees.

In Fig. 2 and the accompanying description (e.g., col. 4 line 32 through col. 5, line 67), Abjanic discloses a method for receiving and processing a message. The message may include a "request-line" identifying a requested program for processing the message headers (col. 4, lines 47-48) in addition to the body of the message representing "the application data or the XML data" (col. 4, lines 50-51). The request-line portion of the message provides an identification of a target application, i.e., a program for processing the message, but not identifying characteristics of the source application (see, e.g., col. 5, lines 1-3). As shown in the example of col. 4, lines 55-66, the body of the message is a document to be processed and does not comprise identifying characteristics of the source application. Although the example document includes a "From" field, the "From" field indicates an individual or group participating in the transaction (in the example, "intel.com") and thus does not comprise identifying characteristics of the source application.

Applicant also respectfully submits that the cited references, taken individually or in combination, do not teach or suggest a method comprising routing the portable message to a target application on the second computer system based on the metadata, in combination with the remaining features of claim 1. The Office Action asserts that Abjanic and Helgeson, in combination, teach this feature. The Office Action admits that Abjanic does not disclose "making routing decisions based on metadata" and asserts that Helgeson discloses this feature in passages such as col. 13, lines 26-27 and 37-38, and col. 109, line 50. For at least the reasons discussed as follows, Applicant respectfully disagrees.

In col. 13, lines 20-40, Helgeson discloses a persistence framework that is "metadata-driven" for creating, restoring, updating, deleting, and finding objects.

Although Helgeson states that the use of metadata "makes applications much easier to port between databases" (col. 13, lines 37-38), there is no teaching or suggestion that anything is routed to a target based on metadata. Furthermore, Helgeson does not teach or suggest that a portable message is routed to a target application on a second computer system based on the metadata.

In col. 109, lines 37-65, Helgeson discloses an InboxID used by a DeliveryService for local message routing. The InboxID is part of the message's address and is assigned to the message by the local DeliveryService (see, e.g., col. 109, lines 45-46 and 62-64). However, there is no teaching or suggestion in Helgeson that a portable message is routed to a target application on a second computer system based on the InboxID.

Therefore, Applicant respectfully submits that Abjanic, Helgeson, and Olson, taken individually or in combination, fail to teach or suggest numerous limitations of claim 1. Even assuming, *arguendo*, that all the limitations recited in the claims are taught or suggested by Abjanic, Helgeson, and Olson, Applicant respectfully submits that it would not have been obvious to one of ordinary skill in the art at the time the invention was made to combine Abjanic, Helgeson, and Olson to produce the claimed invention. For example, in asserting that the combination of Abjanic and Helgeson would produce the limitation "routing the portable message to a target application on the second computer system based on the metadata," the Office Action argues that it would have been obvious "to modify Abjanic of his message transformation method to include the use of routing decisions based on metadata in his advantageous method as taught by Helgeson in order to provide for 'managing data exchange among systems in a network' as stated by Helgeson in his abstract." Applicant submits that the mere recitation of "a system and method for managing data exchange among systems in a network" by Helgeson is not sufficient evidence of a reason to combine Abjanic and Helgeson in the manner suggested by the Office Action.

For at least the reasons discussed above, Applicant respectfully submits that independent claims 1, 12, and 23 are patentably distinct from the cited references. Applicant asserts that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time. Accordingly, Applicant respectfully requests withdrawal of the § 103(a) rejections.

CONCLUSION

Applicant submits the application is in condition for allowance, and an early notice to that effect is requested.

If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above-referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. The Commissioner is hereby authorized to charge any fees which may be required or credit any overpayment to Meyertons, Hood, Kivlin, Kowert & Goetzel P.C., Deposit Account No. 50-1505/5602-12300/JCH.

Also filed herewith are the following items:

☐ Request for Continued Examination

☐ Terminal Disclaimer

☐ Power of Attorney By Assignee and Revocation of Previous Powers

☐ Notice of Change of Address

☐ Other:

Respectfully submitted,

/Jeffrey C. Hood/
Jeffrey C. Hood, Reg. #35198
ATTORNEY FOR APPLICANT(S)

Meyertons, Hood, Kivlin, Kowert & Goetzel PC
P.O. Box 398
Austin, TX 78767-0398
Phone: (512) 853-8800
Date: October 9, 2007 JCH/RPH